

# RESPONSE AND DEVELOPMENT COMPLETION REPORT

AREA A: SUB-PARCEL A8-1  
TRADEPOINT ATLANTIC  
SPARROWS POINT, MARYLAND

Prepared For:



**TRADEPOINT ATLANTIC**  
1600 Sparrows Point Boulevard  
Sparrows Point, Maryland 21219

Prepared By:



**ARM GROUP LLC**  
9175 Guilford Road  
Suite 310  
Columbia, Maryland 20146  
ARM Project No. 20010108

Respectfully Submitted,  
ARM Group Inc.

A handwritten signature in black ink that reads "Melissa R. Hritz".

Melissa Replogle Hritz, E.I.T.  
Project Engineer

A handwritten signature in black ink that reads "Neil Peters".

T. Neil Peters, P.E.  
Senior Vice President

Revision 0 – October 6, 2020

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## 1.0 INTRODUCTION

ARM Group Inc. (ARM), on behalf of Tradepoint Atlantic, has prepared this Response and Development Completion Report for the portion of the Tradepoint Atlantic property that has been designated as Area A: Sub-Parcel A8-1 (the Site). All documents related to the investigation and development of the sub-parcel are listed in the Reference List in **Appendix A**. Copies of relevant email communication are provided in **Appendix B**.

The Sub-Parcel A8-1 Response and Development Work Plan (RADWP) (Revision 0) was submitted to the Maryland Department of the Environment (MDE) and the United States Environmental Protection Agency (USEPA) on February 15, 2018. The RADWP was approved by the agencies on April 5, 2018 (**Appendix B**). An addendum to the RADWP was submitted on October 11, 2018 to address minor development updates as provided by Tradepoint Atlantic. The MDE provided comments on the RADWP Addendum on October 22, 2018. ARM prepared responses and submitted a Comment Response Letter for the RADWP Addendum on November 14, 2018. The MDE provided additional comments on the Comment Response Letter on November 27, 2018, and these comments were addressed to the satisfaction of the MDE in correspondence between Tradepoint Atlantic and the MDE on December 17 and December 18, 2018.

The MDE requested that an additional groundwater sample be collected to the west of the development area on December 11, 2018. ARM installed the piezometer and collected the requested samples in January 2019, and subsequently submitted a RADWP Comment Response Letter to discuss the groundwater results on February 18, 2019. The Comment Response Letter (with groundwater results) was approved on March 28, 2019 (**Appendix B**).

The development of Sub-Parcel A8-1 generally included grading, placement of subbase, construction of an industrial structure, and installation of utilities.

### 1.1. REPORT PURPOSE

The purpose of this Response and Development Completion Report is to document response action and development activities undertaken in order to secure a No Further Action (NFA) Letter and Certificate of Completion (COC) for the Site. In addition, this report is being submitted in accordance with the requirements outlined in the following agreements:

- Administrative Consent Order (ACO) between Tradepoint Atlantic (formerly Sparrows Point Terminal, LLC) and the Maryland Department of the Environment (MDE), effective September 12, 2014; and
- Settlement Agreement and Covenant Not to Sue (SA) between Tradepoint Atlantic (formerly Sparrows Point Terminal, LLC) and the United States Environmental Protection Agency (USEPA), effective November 25, 2014.

The following section (Section 1.2) provides the project background and Section 1.3 provides an overview of the Site development and response action activities. The response actions performed are described in Section 2, and conclusions are provided in Section 3.

## **1.2. PROJECT BACKGROUND**

### **1.2.1. Site Description and History**

From the late 1800s until 2012, the production and manufacturing of steel was conducted at Sparrows Point. Iron and steel production operations and processes at Sparrows Point included raw material handling, coke production, sinter production, iron production, steel production, and semi-finished and finished product preparation. In 1970, Sparrows Point was the largest steel facility in the United States, producing hot and cold rolled sheets, coated materials, pipes, plates, and rod and wire. The steel making operations at the Facility ceased in fall 2012.

Parcel A8 comprises approximately 27.1 acres of an approximately 3,100-acre former steel mill (**Figure 1**) that operated for over one hundred years. The Site consists of approximately 4.1 acres located in the northwestern portion of Parcel A8 (**Figure 2**). The Site is zoned Manufacturing Heavy-Industrial Major (MH-IM), and was not occupied prior to the start of development activities. The southern portion of Parcel A8 was formerly occupied by several buildings making up the Oxygen Plant (also referred to as the Air Products Facility). The Oxygen Plant was an air separation unit. This facility supplied oxygen and nitrogen gas to the steel mill during its operation. Pure gases were separated from the air by first cooling it until it liquefied, then selectively distilling the components at their various boiling temperatures. After its closure, equipment was salvaged from the facility and the buildings were demolished. The Oxygen Plant was located to the south of Sub-Parcel A8-1, and this historical facility did not overlap with the Sub-Parcel A8-1 development area. According to available historical site drawings, there were no significant steel making processes conducted within the boundary of Sub-Parcel A8-1. More information regarding historical activities can be found in the agency approved Phase II Investigation Work Plan for Parcel A8 (Revision 3 dated October 23, 2015). Prior to the start of development activities, the Site was cleared of all significant vegetation.

### **1.2.2. Historical Environmental Activities**

A Phase I ESA was completed by Weaver Boos Consultants for the entire Sparrows Point property on May 19, 2014. The Phase I ESA identified particular features across the Tradepoint Atlantic property which presented potential risks to the environment. The Phase I ESA and associated reports did not identify any RECs, SWMUs, or AOCs within a reasonable proximity to the Sub-Parcel A8-1 boundary.

### **1.2.3. Phase II Investigation**

A Phase II Investigation was conducted for all of Parcel A8 in accordance with the Parcel A8 Phase II Investigation Work Plan – Area A: Parcel A8 (Revision 3) dated October 23, 2015. The results of the Phase II Investigation are presented in the Phase II Investigation Report (Revision 1) dated November 6, 2017. The Phase II Investigation Report was approved by the MDE on September 27, 2018.

### **1.3. SITE DEVELOPMENT AND RESPONSE ACTIONS**

The Site has been developed for use as a greenhouse facility with development activities generally including grading, asphalt paving, construction of an industrial structure totaling approximately 95,000 square feet, and installation of utilities. Subsequent Site use would involve indoor workers in the building, and truck drivers entering and leaving the Site with goods.

The response and development actions approved for protection of human health and the environment at the Site included proper abandonment of piezometers. No other actions were required.

## **2.0 RESPONSE ACTIVITIES**

### **2.1. WELL ABANDONMENT AND INSTALLATION**

One temporary groundwater collection point (piezometers), A8-015-PZ, installed during the Phase II Investigation was properly abandoned as indicated in the Sub-Parcel A8-1 RADWP in accordance with COMAR 26.04.04.34 through 36, on January 5, 2017, prior to the start of development activities. One other piezometer, A8-021-PZ, installed at the request of the MDE, was found to be destroyed on April 10, 2020. Piezometer abandonment records are provided in **Appendix C**.

### 3.0 SITE DEVELOPMENT ACTIVITIES

This section presents a summary of the completed development work as well as materials management and other protocols that were followed during the development of Sub-Parcel A8-1 to adequately mitigate potential risks for future uses of the property.

Full-time oversight was performed by an Environmental Professional (EP) provided by Hillis Carnes Engineering Associates (HCEA) during development activities to ensure compliance with environmental regulations and the development plans, including performing dust monitoring and soil screening services. The Notice of Completion of Remedial Actions letter provided by HCEA (**Appendix D**) states that development activities were completed in general accordance with the Sub-Parcel A8-1 RADWP.

Select photos from general development activities are included in **Appendix E**.

Development activities began on March 11, 2019 with ARCO as the General Contractor.

Site development activities are discussed in the following Quarterly Development Status Updates:

- Area A: Sub-Parcel A8-1 Development Status Update (Second Quarter 2019, Revision 1 dated August 5, 2019)
  - Comment Response Letter dated October 2, 2019
- Area A: Sub-Parcel A8-1 Development Status Update (Third Quarter 2019, dated October 30, 2019)
- Area A: Sub-Parcel A8-1 Development Status Update (Fourth Quarter 2019, dated January 27, 2020)

The above-referenced Quarterly Development Status Updates and associated Responses to Agency Comments are included in **Appendix F**. Details regarding soil management, stockpiling, sample and disposal are provided in the Quarterly Development Status Updates and in the associated comment response letters. The following sections provide information not covered in the Quarterly Development Status Updates or in the associated Responses to Agency Comments.

#### 3.1. PRE-CONSTRUCTION MEETING

A pre-construction meeting was held to address proper operating procedures for working on-site and handling potentially contaminated material. A memo documenting the meeting is included in **Appendix G**.



### **3.2. EROSION AND SEDIMENT CONTROL INSTALLATION FOR DEVELOPMENT**

Installation of erosion and sediment controls was completed in accordance with the requirements of the Baltimore County permit prior to any construction at the Site.

### **3.3. FILL**

Utility trench fill materials used during development activities at Sub-Parcel A8-1 are discussed in the Quarterly Development Status Reports and in the associated comment response letter. The clean fill materials were approved by the MDE via email on October 30, November 6, and November 25, 2019 (see **Appendix H**). The CR-6 material from Martin Marietta and the #10 Screenings material were used as utility trench backfill. The topsoil from the Baltimore Zoo was used in landscaped areas. No marker fabric was used in the landscaped areas because no environmental capping was required for the Sub-Parcel.

### **3.4. EXCAVATED SOIL MANAGEMENT**

No elevated PID readings, odors, or staining were detected in any of the soils inspected during the development of Sub-Parcel A8-1. The majority of screened soil was replaced inside utility trenches. Approximately 2,000 cubic yards of excess soil were transported and stockpiled on Sub-Parcel B6-2. Prior to transport, these soils were screened, and there was no evidence of environmental impact.

### **3.5. SOIL SAMPLING AND DISPOSAL**

No elevated PID readings, odors, or staining were detected in any of the soils inspected during the development of Sub-Parcel A8-1. Therefore, no material segregation, material stockpiling, analytical sampling, or offsite removal of soils to Greys Landfill or elsewhere were required.

### **3.6. DUST CONTROL**

General construction operations, including trenching for utilities, mass grading, retention wall installation, paving, and topsoil placement were performed at the Site. To limit worker exposure to contaminants borne on dust and windblown particulates, dust control measures were to be implemented, if warranted when the above activities were performed.

Electronic dust monitoring was not performed because the area experienced very low volumes of vehicular traffic, and the amount of spoils generated during construction activities was generally limited. Instead, visual dust monitoring was performed, and no visible dust migration was observed during the development of Sub-Parcel A8-1. The Contractor utilized a water truck to mitigate dust generation during the development work operations.

### **3.7. WATER MANAGEMENT**

Dewatering during construction was necessary for underground utility work (trenches/excavations) and light pole installation. All dewatering was done in accordance with all local, state, and federal regulations.

The EP inspected the water that collected in the trenches. The majority of water from dewatering was discharged into an infiltration gallery installed as approved by the MDE on April 8, 2019 (see **Appendix B**). For a short time during development, dewatering discharges were pumped to a frac tank prior to being trucked to the Humphrey Creek Wastewater Treatment Plant (HCWWTP) on the Tradepoint Atlantic property. No aqueous samples were collected during the development of Sub-Parcel A8-1.

### **3.8. HEALTH AND SAFETY**

The contractor was responsible for following safety procedures, including schedule limitations, to control contact with potentially contaminated soil or groundwater. The RADWP specified limits for exposure days of ground-intrusive work for each employee. In lieu of tracking exposure days, the site contractors elected to employ Modified Level D personal protective equipment (PPE), as allowed by the RADWP. Acknowledgement forms signed by the site contractors are provided in **Appendix I**.

### **3.9. NOTABLE OCCURRENCES**

During the development of Sub-Parcel A8-1, no evidence of environmental contamination (staining, odors, elevated PID readings) was detected in any screened soil. There were no notable occurrences.

### **3.10. INSTITUTIONAL CONTROLS (FUTURE LAND USE CONTROLS)**

Long-term conditions related to future use of the Site will be described within the No Further Action Letter (NFA) and COC. These conditions are anticipated to include the following:

- A restriction that limits the use of the property to industrial land use.
- A restriction prohibiting the use of groundwater for any purpose at the Site and a requirement to characterize, containerize, and properly dispose of groundwater in the event of deep excavations encountering groundwater.
- Notice to MDE prior to any future soil disturbance activities at the Site. This written notice will be required at least 30 days prior to any planned excavation activities.
- Requirement for a HASP in the event of any future excavations at the Site.

- Complete appropriate characterization and disposal of any future material excavated at the Site in accordance with applicable local, state and federal requirements.

The responsible party will file the above deed restrictions as defined by the MDE VCP in the NFA and COC. The soil disturbance and maintenance requirements will apply to the entire Site. The entire Site will be subject to the industrial use groundwater use restrictions.

### **3.11. POST REMEDIATION REQUIREMENTS**

Post remediation requirements will include compliance with the conditions specified in the NFA, COC, and the deed restrictions recorded for the Site. Deed restrictions will be recorded within 30 days after receipt of the final NFA.

Specific inspection protocols and maintenance schedules will be addressed in an Institutional Controls and Operations & Maintenance Plan, specific to Sub-Parcel A8-1, to be submitted under separate cover.

In addition, the MDE will be provided with a written notice at least 30 days prior to any planned excavation activities at the Site. Written notice of planned excavation activities will include the proposed date(s) for the excavation, location of the excavation, health and safety protocols (as required), clean fill source (as required), and proposed characterization and disposal procedures.

## 4.0 CONCLUSION

Between March 2019 and December 2019, response and development actions were conducted as part of the redevelopment of the Site identified as Sub-Parcel A8-1. The primary response and development actions included abandonment of temporary groundwater collection points, construction of a greenhouse structure, underground utilities, lighting improvements, a stormwater outfall, parking areas, and landscaped areas.

A Notice of Completion of Remedial Actions prepared by the EP is enclosed in **Appendix D** to certify that the response actions have been completed in accordance with the requirements described in the RADWP and the Site is suitable for occupancy and use.

As a result of the information contained herein, it has been demonstrated that the response and development actions have been completed in accordance with the approved RADWP. The applicable requirements for obtaining a NFA Letter and COC for this Site have been fulfilled. Therefore, Tradepoint Atlantic is respectfully requesting issuance of a NFA Letter for the Site at this time. It is ARM's understanding that Tradepoint Atlantic will record the NFA Letter and the deed restrictions identified in the RADWP within 30 days after receipt of the final NFA Letter. Proof of recordation will be submitted to MDE upon receipt from Baltimore County.

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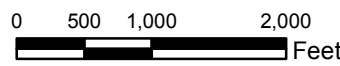
## **FIGURES**

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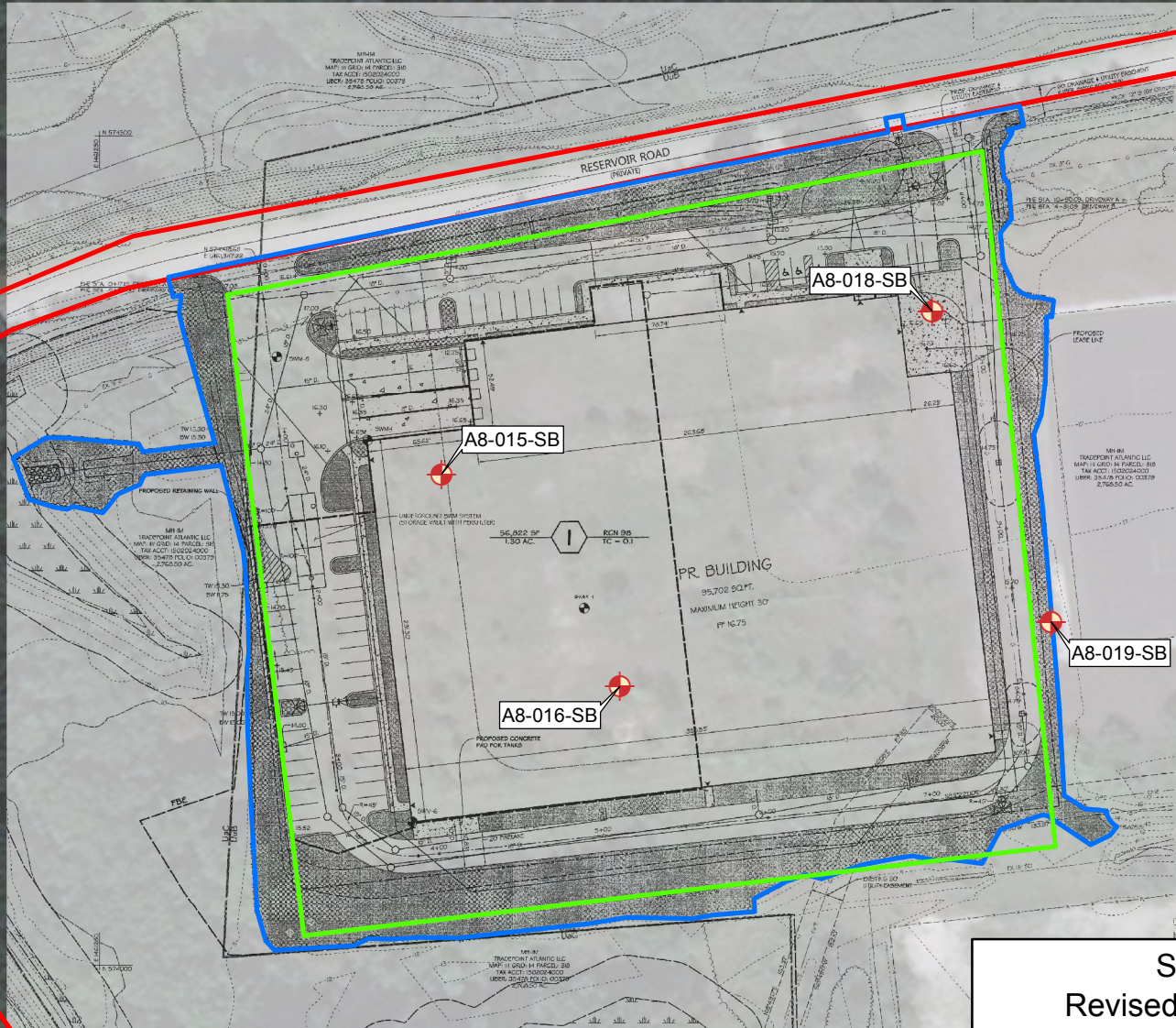
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	Site Boundary
	Parcel Boundaries
	Private Property

<b>Tradepoint Atlantic</b> <b>Area A and Area B Parcels</b> October 6, 2020		<b>Figure</b> <b>1</b>
  <b>ARM Group LLC</b> Engineers and Scientists	Tradepoint Atlantic	
	Sparrows Point	
	Baltimore County, MD	
	Area A: Project 200101 Area B: Project 200102	
		

Parcel A7



- Soil Boring
- Lease Line
- Limit of Disturbance
- Parcel Boundary

Parcel A8

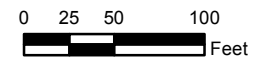
### Sub-Parcel A8-1 Revised Development Layout

October 6, 2020

Figure  
2



**ARM Group LLC**  
Engineers and Scientists



Tradepoint Atlantic
Sparrows Point
Baltimore County, MD
ARM Project 20010108

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## **APPENDIX A**

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## Reference List

### Sub-Parcel A8-1

Weaver Boos Consultants (2014). *Phase I Environmental Site Assessment: Former RG Steel Facility*. Final Draft. May 19, 2014.

ARM Group, Inc. (2015). *Phase II Investigation Work Plan, Area A: Parcel A8*. Revision 3. October 23, 2015.

ARM Group, Inc. (2017). *Phase II Investigation Report, Area A: Parcel A8*. Revision 1. November 6, 2017.

ARM Group, Inc. (2018). *Response and Development Work Plan, Area A: Sub-Parcel A8-1*. Revision 0. February 15, 2018.

*(Approval to proceed with development was given following review of Revision 0, and final approval of the RADWP was given following review of the RADWP Addendum, Comment Response Letter, and further email communication)*

ARM Group, Inc. (2018). *Response and Development Work Plan Addendum, Area A: Sub-Parcel A8-1*. Revision 0. October 11, 2018.

ARM Group, Inc. (2018). *Comment Response Letter – Response and Development Work Plan Addendum, Area A: Sub-Parcel A8-1*. November 14, 2018.

ARM Group, Inc. (2018). *Comment Response Letter – Response and Development Work Plan Addendum, Area A: Sub-Parcel A8-1*. February 18, 2019.

ARM Group, Inc. (2019). *Quarterly Development Status Update: Second Quarter 2019, Area A: Sub-Parcel A8-1*. Revision 1. August 5, 2019.

ARM Group, Inc. (2019). *Comment Response Letter – Quarterly Development Status Update: Second Quarter 2019, Area B: Sub-Parcel A8-1*. October 2, 2019.

ARM Group, Inc. (2019). *Quarterly Development Status Update: Third Quarter 2019, Area B: Sub-Parcel A8-1*. October 30, 2019.

ARM Group, Inc. (2020). *Quarterly Development Status Update: Fourth Quarter 2019, Area B: Sub-Parcel A8-1*. January 27, 2020.

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## **APPENDIX B**

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**From:** [Neil Peters](#)  
**To:** [Taylor Smith](#)  
**Subject:** Fwd: Tradepoint Sub-Parcel A8-1 Response and Development Work Plan Revision 0  
**Date:** Thursday, April 5, 2018 4:29:59 PM

---

Begin forwarded message:

**From:** "Prince, Ruth" <[Prince.Ruth@epa.gov](mailto:Prince.Ruth@epa.gov)>  
**Date:** April 5, 2018 at 11:21:55 AM EDT  
**To:** James Calenda <[jcalenda@enviroanalyticsgroup.com](mailto:jcalenda@enviroanalyticsgroup.com)>, Pete Haid <[phaid@tradepointatlantic.com](mailto:phaid@tradepointatlantic.com)>, Neil Peters <[npeters@armgroup.net](mailto:npeters@armgroup.net)>, "Russ Becker" <[rbecker@enviroanalyticsgroup.com](mailto:rbecker@enviroanalyticsgroup.com)>  
**Cc:** "[barbara.brown1@maryland.gov](mailto:barbara.brown1@maryland.gov)" <[barbara.brown1@maryland.gov](mailto:barbara.brown1@maryland.gov)>, "Jennifer Sohns -MDE-" <[jennifer.sohns@maryland.gov](mailto:jennifer.sohns@maryland.gov)>, "Weissbart, Erich" <[Weissbart.Erich@epa.gov](mailto:Weissbart.Erich@epa.gov)>  
**Subject:** Tradepoint Sub-Parcel A8-1 Response and Development Work Plan Revision 0

Hi All – the QC review is complete and this R&DWP is approved with no comments. MDE and EPA agreed yesterday that you can proceed.

Ruth Prince, PhD Toxicologist  
3LC10, Office of Remediation  
Land and Chemicals Division  
U.S. Environmental Protection Agency Region III  
1650 Arch St.  
Philadelphia, PA 19103-2029  
215-814-3118  
[prince.ruth@epa.gov](mailto:prince.ruth@epa.gov)

**From:** [James Calenda](#)  
**To:** [Neil Peters](#); [Taylor Smith](#); [Eric Magdar](#)  
**Subject:** FW: RDWP Addendum Comment Response Letter - February 18, 2019  
**Date:** Thursday, March 28, 2019 1:39:14 PM

---

FYI

**From:** Jennifer Sohns -MDE- <jennifer.sohns@maryland.gov>  
**Sent:** Thursday, March 28, 2019 1:34 PM  
**To:** James Calenda <jcalenda@enviroanalyticsgroup.com>  
**Cc:** Pete Haid <phaid@tradepointatlantic.com>; Matthew Newman <mnewman@tradepointatlantic.com>; Barbara Brown -MDE- <barbara.brown1@maryland.gov>; Craven, Laura <lcraven@wcgrp.com>  
**Subject:** RDWP Addendum Comment Response Letter - February 18, 2019

James,

I want to let you know Barbara and I have reviewed the above-referenced comment response letter providing groundwater sampling results from the area near a proposed outfall that will be installed as part of the Gotham Greens development. At this time, our department does not have additional comment, however, the results have been forwarded to an appropriate contact in the Water Management Administration. If there are any more comments, I expect you would hear from that department directly.

Let me know if you have any questions.

--

Jennifer Sohns  
Maryland Department of Environment  
Land Management - VCP  
410-537-4472

[Click here](#) to complete a three question customer experience survey.

**From:** [Pete Haid](#)  
**To:** [Taylor Smith](#)  
**Subject:** FW: RDWP Addendum Sub-Parcel A8-1 - MDE Comments  
**Date:** Thursday, January 17, 2019 3:40:44 PM

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**From:** Jennifer Sohns -MDE- <jennifer.sohns@maryland.gov>  
**Sent:** Tuesday, December 18, 2018 9:39 AM  
**To:** Pete Haid <phaid@tradepointatlantic.com>  
**Subject:** Re: RDWP Addendum Sub-Parcel A8-1 - MDE Comments

Got it.  
Thank you Pete

On Mon, Dec 17, 2018 at 2:38 PM Pete Haid <[phaid@tradepointatlantic.com](mailto:phaid@tradepointatlantic.com)> wrote:

Jenn:

Good afternoon. In response to your earlier email:

The following is the updated schedule:

- Rough Grading for Building Pad                      December 2018
- Underground Utilities                                      January 2019
- Building Foundations                                      February 2019
- Concrete Floor Slab                                        March 2019
- Storm Drain & Stormwater                                April 2019
- Exterior Paving and Landscaping                        May 2019
- Security Fence Installation                                June 2019
- Completion Report                                         August 2019
- Request for NFA from MDE                                August 2019

Offsite clean soil for raising the sub-parcel has been sampled and tested, and the results have been submitted to the MDE. This material has been approved for use on Gotham Greens.

Groundwater that is encountered and pumped out of trenches or excavations will be trucked to the HCWWTP. In the unlikely event that the amount of water generated makes trucking the water to the HCWWTP impractical, the water will be pumped to the HCWWTP using temporary piping and hoses.

EAG will be addressing the sampling of the groundwater near the new outfall shortly.

Thank you.

Pete

**From:** Jennifer Sohns -MDE- <[jennifer.sohns@maryland.gov](mailto:jennifer.sohns@maryland.gov)>  
**Sent:** Tuesday, December 11, 2018 1:54 PM  
**To:** James Calenda <[jcalenda@enviroanalyticsgroup.com](mailto:jcalenda@enviroanalyticsgroup.com)>  
**Cc:** Pete Haid <[phaid@tradepointatlantic.com](mailto:phaid@tradepointatlantic.com)>; Barbara Brown -MDE- <[barbara.brown1@maryland.gov](mailto:barbara.brown1@maryland.gov)>  
**Subject:** Re: RDWP Addendum Sub-Parcel A8-1 - MDE Comments

Pete,

MDE is requesting that a groundwater sample be collected from the area of the new stormwater outfall proposed for construction on Parcel A8-1. The sample should be analyzed for parameters detailed in the Phase II Investigation Work Plan for Parcel A8. This request is being made based on the new outfall's potential intersection with the groundwater in this area of the site, the lack of groundwater sampling in the vicinity, and the determination that no cap or lining of stormwater systems is required for this development.

Let me know if you have any questions.

Thank you,  
Jennifer Sohns

On Tue, Nov 27, 2018 at 11:11 AM Jennifer Sohns -MDE- <[jennifer.sohns@maryland.gov](mailto:jennifer.sohns@maryland.gov)> wrote:

James and Pete,

Thank you for the response to comments. I have a few more questions/comments and we can discuss Thursday as well.

Based on the delay in the project start date, a revised schedule is needed and should reflect the increased time it will take to complete utility work.

Has the source of the soil needed to raise the site elevation been selected/sampled? To date, we have not seen any sampling results (to my knowledge) for our review/approval to bring on-site. This work should be on the revised schedule.

The stormwater outfall to be constructed on-site discharges to an adjacent stream and will be below the groundwater elevation. We may want to take a look at this area of the site while we are there on Thursday.

Sections of the original/full RDWP (e.g. 5.2 and 5.2.2) state that dewatering is not anticipated due to limited intrusive activities/groundwater is not expected to be encountered. These statements are no longer accurate since the stormwater outfall construction and associated piping/trenching will more than likely encounter groundwater. The plan states that all groundwater encountered will be sent to HWWTP. Is this still the plan? What will be the method of getting this water to the treatment plant?

Let me know if you have any questions.

Thank you,  
Jennifer Sohns

On Wed, Nov 14, 2018 at 5:02 PM James Calenda <[jcalenda@enviroanalyticsgroup.com](mailto:jcalenda@enviroanalyticsgroup.com)> wrote:

Jennifer,

Please see attached for the comment and response letter that we put together to address the comments you sent to us on October 22, 2018. Hard copies of the letter will be prepared and distributed by the end of the week. If you have any questions, please let me know.

Thanks  
James

**From:** Jennifer Sohns -MDE- <[jennifer.sohns@maryland.gov](mailto:jennifer.sohns@maryland.gov)>

**Sent:** Monday, October 22, 2018 12:07 PM

**To:** James Calenda <[jcalenda@enviroanalyticsgroup.com](mailto:jcalenda@enviroanalyticsgroup.com)>; [phaid@tradepointatlantic.com](mailto:phaid@tradepointatlantic.com)

**Cc:** [barbara.brown1@maryland.gov](mailto:barbara.brown1@maryland.gov); [lcraven@wcgrp.com](mailto:lcraven@wcgrp.com)

**Subject:** RDWP Addendum Sub-Parcel A8-1 - MDE Comments

James,

The Department reviewed the RDWP Addendum for Sub-Parcel A8-1, dated October 11, 2018 and we require additional details for our review.

Please submit a figure that depicts construction details for the new stormwater outfall on the western portion of the property.

Determine if this storm water outfall will intersect the groundwater table.

Regarding the exposure days listed for the Construction Worker (storm drain and stormwater) in the approved RDWP, will the duration remain the same? 18 exposure days?

Thank you,

--

Jennifer Sohns  
Maryland Department of Environment  
Land Management - VCP  
410-537-4472

[Click here](#) to complete a three question customer experience survey.

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Jennifer Sohns  
Maryland Department of Environment  
Land Management - VCP  
410-537-4472

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Jennifer Sohns  
Maryland Department of Environment  
Land Management - VCP  
410-537-4472

[Click here](#) to complete a three question customer experience survey.

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Jennifer Sohns  
Maryland Department of Environment  
Land Management - VCP  
410-537-4472

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## **APPENDIX C**

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# Well/Piezometer Abandonment Form

**Well/Piezometer ID: A8-015-PZ**

**General Project Information:**

Client: EAG

Site Location: Sparrows Point, MD

Parcel ID: A8

Abandonment Date: 1/5/17

Abandonment Contractor: GSI

Abandonment Method (circle appropriate):

- 1. PVC → Pulled / Split / Perforated / Left-In-Place
- 2. Abandoned → Grout / Bentonite Chips

Field Equipment: Oil-Water Probe

ARM Representative(s): Lisa Perrin

**Well Diameter:** 1 inch

Depth to Bottom (TOC)	Final Gauging Prior to Abandonment:
Reported (historical/log): 3.95 ft stick up, 5 ft riser, 15 ft screen	Depth to Water (TOC): Not recorded
Measured: Not recorded	Depth to NAPL (TOC): Not recorded

Please note if this abandonment is for a known NAPL delineation/monitoring area or individual NAPL screening piezometer and identify the name of the delineation area (e.g., B6-066 NAPL Area or B5-144 Screening Piezometer): \_\_\_\_\_

**Please Note:** If NAPL is identified in a piezometer, the Project Manager should be notified and the piezometer may not be abandoned unless the presence of NAPL is already known and a decision has been made to abandon the NAPL monitoring network.

**Additional Comments (if any):**

Transcribed from ARM field book records. Piezometer was abandoned prior to the MDE directive to gauge piezometers a final time prior to abandonment.



**ARM Group Inc.**  
**Engineers and Scientists**  
9175 Guilford Road - Suite 310  
Columbia, Maryland 21046  
(410) 290-7775 FAX: (410) 290-7775

## Well/Piezometer Abandonment Form

**Well/Piezometer ID:** AS-021-PZ

**General Project Information:**

Client: EAG

Site Location: Sparrows Point, MD

Parcel ID: AS

Abandonment Date: 4/10/20

Abandonment Contractor: NA

Abandonment Method (circle appropriate):

1. PVC → Pulled / Split / Perforated / Left-In-Place
2. Abandoned → Grout / Bentonite Chips

Did not abandon

Field Equipment:

ARM Representative(s): L. Perrin

Well Diameter: 1"

Depth to Bottom (TOC)	Final Gauging Prior to Abandonment:
Reported (historical/log):	Depth to Water (TOC): NA
Measured: NA	Depth to NAPL (TOC): NA

Please note if this abandonment is for a known NAPL delineation/monitoring area or individual NAPL screening piezometer and identify the name of the delineation area (e.g., B6-066 NAPL Area or B5-144 Screening Piezometer): \_\_\_\_\_

**Please Note:** If NAPL is identified in a piezometer, the Project Manager should be notified and the piezometer may not be abandoned unless the presence of NAPL is already known and a decision has been made to abandon the NAPL monitoring network.

**Additional Comments (if any):**

Did not abandon: piezo appears to be destroyed/missing due to area construction.



**ARM Group Inc.**  
**Earth Resource Engineers and Consultants**  
 9175 Guilford Road - Suite 310  
 Columbia, Maryland 21046  
 (410) 290-7775 FAX: (410) 290-7775

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## **APPENDIX D**

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May 1, 2020

Mr. Pete Haid  
TradePoint Atlantic  
1600 Sparrows Point Boulevard  
Baltimore, Maryland 21219

10975 Guilford Road, Suite A  
Annapolis Junction, MD 20701  
Phone (410) 880-4788  
Fax (410) 880-4098  
www.hcea.com

RE: Notice of Completion of Remedial Actions  
Area A: Sub-Parcel A8-1  
Baltimore County, Maryland  
HCEA Project Number 18078B

Dear Mr. Haid:

Hillis-Carnes Engineering Associates, Inc. (HCEA) is pleased to provide this Notice of Completion of Remedial Actions (Notice) for Area A: Sub-Parcel A8-1 in the Sparrows Point area of Baltimore County, Maryland (Site).

In conjunction with HCEA's environmental services at the Site, HCEA was provided with the Response and Development Work Plan for Area A: Sub-Parcel A8-1 (dated February 15, 2018 and associated Addendum - Comment Response Letter dated February 18, 2019), hereafter referred to as the RDWP. Based on observations made during HCEA's environmental monitoring at the Site, to the best of our knowledge, understanding, and belief, the environmental cap installed at the Site (e.g., pavement thickness and VCP-approved clean fill thickness) was installed in general accordance with the RDWP.

This Notice has been prepared for the exclusive use of the Client pursuant to the agreement between the Client and HCEA, dated March 1, 2019, in accordance with generally accepted industry practices. All terms and conditions set forth in the agreement are incorporated herein. No warranty, express or implied, is made herein. Use and reproduction of this Notice by any other person is unauthorized.

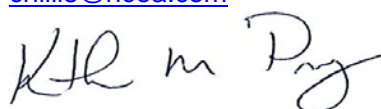
HCEA appreciates the opportunity to have been of assistance on this project. If you have any questions regarding this Notice, please feel free to contact us at 410-880-4788.

Sincerely,

**HILLIS-CARNES ENGINEERING ASSOCIATES, INC.**



Christopher J. Hillis, P.E.  
Project Engineer  
[chillis@hcea.com](mailto:chillis@hcea.com)



Keith M. Progin  
Senior Environmental Project Manager  
[kprogin@hcea.com](mailto:kprogin@hcea.com)

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## **APPENDIX E**

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Development Photograph Log  
Sub-Parcel A8-1  
Sparrows Point, Maryland



Photo 1: Utility excavation



Photo 2: Utility installation

Development Photograph Log  
Sub-Parcel A8-1  
Sparrows Point, Maryland



Photo 3: Utility excavation



Photo 4: Utility excavation and installation



Development Photograph Log  
Sub-Parcel A8-1  
Sparrows Point, Maryland



Photo 5: Utility excavation backfilling



Photo 6: Surface paving

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## **APPENDIX F**

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# ARM Group Inc.

Engineers and Scientists

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August 5, 2019

Ms. Barbara Brown  
Project Coordinator  
Maryland Department of the Environment  
1800 Washington Boulevard  
Baltimore, MD 21230

Re: Quarterly Development Status Update  
Second Quarter 2019 – Revision 1  
Area A: Sub-Parcel A8-1  
Tradepoint Atlantic  
Sparrows Point, MD 21219

Dear Ms. Brown,

ARM Group Inc. (ARM), on behalf of EnviroAnalytics Group (EAG), has prepared this Quarterly Development Status Update to document ongoing and completed development activities performed on Sub-Parcel A8-1 during the second quarter of 2019. A few weeks of gas line installation work performed in March of 2019 are also covered by this Quarterly Development Status Update. The Sub-Parcel A8-1 Response and Development Work Plan (RADWP), Revision 0, dated February 15, 2018 was approved by the agencies on April 5, 2018. Following a slight change to the development plan, an addendum dated October 11, 2018, and associated comment response letters dated November 14, 2018 and February 18, 2019 were submitted and were approved by the agencies on March 28, 2019. The overall development of Sub-Parcel A8-1 generally includes grading, placement of subbase, construction of an industrial structure, and installation of utilities.

## **Piezometer Abandonment**

Two piezometers were present in the sub-parcel: A8-015-PZ and A8-021-PZ. Piezometer A8-015-PZ was properly abandoned in accordance with COMAR 26.04.04.34 through 36 on January 5, 2017. Piezometer A8-021-PZ remains on the parcel.

## **Environmental Oversight**

Full-time oversight was performed by an Environmental Professional (EP) provided by Hillis Carnes Engineering Associates (HCEA) during intrusive development activities. No oversight was performed during grading and subbase placement. In addition to general oversight to ensure compliance with environmental regulations and the development plans, the EP was responsible

for performing dust monitoring and soil screening services during intrusive activities. As discussed below, no electronic dust monitoring was performed in the second quarter of 2019.

### **Development Progress**

Development activities began on April 29, 2019 with ARCO Murray as the General Contractor, with a gas line installation performed in late March to April 2019 performed by Ligon & Ligon. Work performed to date has included gas line installation, mass grading, and structure construction.

### **Dust Monitoring**

No electronic dust monitoring was performed during the second quarter of 2019 because construction activities across the site were limited, and the amount of soil spoils generated was limited. Instead, visual dust monitoring was performed, and no visible dust migration was observed in the second quarter of 2019.

### **Soil Management**

Clean fill approved by the MDE was placed as utility trench backfill for the gas line installed by Ligon & Ligon. Approval documentation will be provided in the Sub-Parcel A8-1 Development Completion Report. The EP screened material removed during excavations with a MultiRAE photoionization detector (PID). No elevated PID readings, odors, or staining were detected in any of the soils inspected in March or in the second quarter of 2019. Therefore, no material segregation, material stockpiling, or offsite removal of soils to Greys Landfill or elsewhere were required in the second quarter of 2019. In the second quarter of 2019, screened soils which exhibited no evidence of contamination were replaced inside the excavated utility trenches.

### **Water Management**

During the gas line installation performed in March and April 2019, dewatering was conducted into a frac tank that was then trucked to a drain that conveyed to the Humphreys Creek Wastewater Treatment Plant (HCWWTP). No dewatering occurred in May or June 2019.

If you have questions regarding any information covered in this document, please feel free to contact ARM Group Inc. at (410) 290-7775.

Respectfully Submitted,  
ARM Group Inc.



Melissa A. Replogle, E.I.T.  
Project Engineer



T. Neil Peters, P.E.  
Senior Vice President





# ARM Group Inc.

Engineers and Scientists

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October 2, 2019

Ms. Barbara Brown  
Project Coordinator  
Maryland Department of the Environment  
1800 Washington Boulevard  
Baltimore, MD 21230

Re: Quarterly Development Status Update  
Second Quarter 2019 – Revision 1  
Area A: Sub-Parcel A8-1  
Comment Response Letter  
Tradepoint Atlantic  
Sparrows Point, MD 21219

Dear Ms. Brown:

On behalf of EnviroAnalytics Group, LLC (EAG), ARM Group Inc. (ARM) is pleased to provide the following responses to comments provided by the Maryland Department of the Environment (MDE) via email on August 20, 2019 regarding the previous submission of the Sub-Parcel A8-1 Quarterly Development Status Update for the second quarter of 2019 (dated July 30, 2019). An updated version of the document (Revision 1) was provided to the agencies electronically on August 20, 2019. This updated version removed an incorrect reference in the Dust Monitoring section to slag placement on the sub-parcel. Responses to specific MDE comments are given below; the original comments are included in italics with responses following.

## **Responses to MDE Comments:**

- 1. Pg. 2 - "No electronic dust monitoring was performed during the 2nd quarter of 2019 because slag fill has been placed across the entirety of the site, construction activities across the site were limited and the amount of soil spoils generated was limited." Please clarify how the placement of slag on the site diminishes risks related to dust generation? It is assumed that excavation for utilities will still be conducted through the placed slag which is a material that can generate dust. Provide more detail regarding gas line installation since it is considered a limited construction activity. Was the gas line already in existence across the northern portion of the site? Only connections needed to be installed? Or, was an entirely new gas line run across the northern portion of the site? Is this the only intrusive activity done in the 2nd quarter?*

As corrected in Revision 1 of the Sub-Parcel A8-1 Quarterly Status Update for the 2<sup>nd</sup> quarter of 2019 (submitted electronically on August 20, 2019), no slag was placed anywhere on the sub-parcel. An extension and connections to an existing gas line were installed in the northern portion of the site. Intrusive activities during the 2<sup>nd</sup> quarter of 2019 included footer installation, foundation excavation, plumbing installation, and electric line installation. Development work on Sub-Parcel A8-1 was visually monitored for dust. The area experienced very low volumes of vehicular traffic, and intrusive activities were performed by a single work crew in only one area at a time, which limited the amount of dust produced.

2. *Also, the RDWP notes that the site will be uncapped. The most recent correspondence I dug up on the placement of fill on this parcel was related to clean fill imported to the site. Slag is not clean fill. Confirm the placement of slag on the site. Slag placed on site for grading and/or backfill triggers a requirement for a cap on the parcel. Provide details regarding reasons for this change if it is accurate.*

As corrected in Revision 1 of the Sub-Parcel A8-1 Quarterly Status Update for the 2<sup>nd</sup> quarter of 2019, no slag was placed anywhere on the sub-parcel. Utility trenches were backfilled with clean fill. No changes to the capping requirements are required.

If you have any questions, or if we can provide any additional information at this time, please do not hesitate to contact ARM Group Inc. at 410-290-7775.

Respectfully submitted,  
ARM Group Inc.



Melissa Replogle, E.I.T.  
Project Engineer



T. Neil Peters, P.E.  
Senior Vice President





# ARM Group Inc.

Engineers and Scientists

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October 30, 2019

Ms. Barbara Brown  
Project Coordinator  
Maryland Department of the Environment  
1800 Washington Boulevard  
Baltimore, MD 21230

Re: Quarterly Development Status Update  
Third Quarter 2019  
Area A: Sub-Parcel A8-1  
Tradepoint Atlantic  
Sparrows Point, MD 21219

Dear Ms. Brown,

ARM Group Inc. (ARM), on behalf of EnviroAnalytics Group (EAG), has prepared this Quarterly Development Status Update to document ongoing and completed development activities performed on Sub-Parcel A8-1 during the third quarter of 2019. The Sub-Parcel A8-1 Response and Development Work Plan (RADWP), Revision 0, dated February 15, 2018 was approved by the agencies on April 5, 2018. Following a slight change to the development plan, an addendum dated October 11, 2018 and associated comment response letters dated November 14, 2018 and February 18, 2019 were submitted and were approved by the agencies on March 28, 2019. The overall development of Sub-Parcel A8-1 generally includes grading, placement of subbase, construction of an industrial structure, and installation of utilities. Development work completed on Sub-Parcel A8-1 prior to July 1, 2019 is discussed in the previously submitted Quarterly Development Status Update (August 5, 2019 with Comment Response Letter dated October 2, 2019).

## **Piezometer Abandonment**

Two piezometers were present in the sub-parcel: A8-015-PZ and A8-021-PZ. Piezometer A8-015-PZ was properly abandoned in accordance with COMAR 26.04.04.34 through 36 on January 5, 2017. Piezometer A8-021-PZ remains on the parcel.

## **Environmental Oversight**

Full-time oversight was performed by an Environmental Professional (EP) provided by Hillis Carnes Engineering Associates (HCEA) during intrusive development activities. No oversight was performed during grading and subbase placement. In addition to general oversight to ensure compliance with environmental regulations and the development plans, the EP was responsible

for performing dust monitoring and soil screening services during intrusive activities. As discussed below, no electronic dust monitoring was performed in the third quarter of 2019.

### **Development Progress**

Development activities began prior to the third quarter of 2019 with ARCO Murray as the General Contractor, with a gas line installation performed in late March to April 2019 performed by Ligon & Ligon. Work performed to date has included excavation for sewer and utility lines, gas line installation, mass grading, and structure construction.

### **Dust Monitoring**

No electronic dust monitoring was performed during the third quarter of 2019 because construction activities across the site were limited, and the amount of soil spoils generated was limited. Instead, visual dust monitoring was performed, and no visible dust migration was observed in the third quarter of 2019.

### **Soil Management**

The EP screened material removed during excavations with a MultiRAE photoionization detector (PID). No elevated PID readings, odors, or staining were detected in any of the soils inspected in March or in the second quarter of 2019. Therefore, no material segregation, material stockpiling, or offsite removal of soils to Greys Landfill or elsewhere were required in the second quarter of 2019. In the third quarter of 2019, screened soils which exhibited no evidence of contamination were replaced inside the excavated utility trenches.

### **Water Management**

During the third quarter of 2019, water from dewatering was discharged into the infiltration gallery installed for the Northern Sewer development work, as approved by the MDE on April 8, 2019. The water was first pumped through filter bags prior to discharge.

If you have questions regarding any information covered in this document, please feel free to contact ARM Group Inc. at (410) 290-7775.

Respectfully Submitted,  
ARM Group Inc.



Melissa A. Replogle, E.I.T.  
Project Engineer



T. Neil Peters, P.E.  
Senior Vice President







# ARM Group LLC

Engineers and Scientists

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January 27, 2020

Ms. Barbara Brown  
Project Coordinator  
Maryland Department of the Environment  
1800 Washington Boulevard  
Baltimore, MD 21230

Re: Quarterly Development Status Update  
Fourth Quarter 2019  
Area A: Sub-Parcel A8-1  
Tradepoint Atlantic  
Sparrows Point, MD 21219

Dear Ms. Brown,

On behalf of EnviroAnalytics Group, LLC (EAG), ARM Group LLC (ARM) has prepared this Quarterly Development Status Update to document ongoing and completed development activities performed on Sub-Parcel A8-1 during the fourth quarter of 2019. The Sub-Parcel A8-1 Response and Development Work Plan (RADWP), Revision 0, dated February 15, 2018 was approved by the agencies on April 5, 2018. Following a slight change to the development plan, an addendum dated October 11, 2018 and associated comment response letters dated November 14, 2018 and February 18, 2019 were submitted and were approved by the agencies on March 28, 2019. The overall development of Sub-Parcel A8-1 generally includes grading, placement of subbase, construction of an industrial structure, and installation of utilities. Development work completed on Sub-Parcel A8-1 prior to October 1, 2019 is discussed in the previously submitted Quarterly Development Status Updates (August 5, 2019 with Comment Response Letter dated October 2, 2019, and October 30, 2019).

### **Piezometer Abandonment**

Two piezometers were present in the sub-parcel: A8-015-PZ and A8-021-PZ. Piezometer A8-015-PZ was properly abandoned in accordance with COMAR 26.04.04.34 through 36 on January 5, 2017. Piezometer A8-021-PZ remains on the parcel.

### **Environmental Oversight**

Full-time oversight was performed by an Environmental Professional (EP) provided by Hillis Carnes Engineering Associates (HCEA) during intrusive development activities. No oversight was performed during grading and subbase placement. In addition to general oversight to ensure

compliance with environmental regulations and the development plans, the EP was responsible for performing dust monitoring and soil screening services during intrusive activities. As discussed below, no electronic dust monitoring was performed in the fourth quarter of 2019.

### **Development Progress**

Development activities began prior to the fourth quarter of 2019 with ARCO Murray as the General Contractor, with a gas line installation performed in late March to April 2019 performed by Ligon & Ligon. Work performed to date has included excavation for sewer and utility lines, gas line installation, mass grading, retention wall installation, structure construction, paving, and topsoil placement.

### **Dust Monitoring**

No electronic dust monitoring was performed during the fourth quarter of 2019 because construction activities across the site were limited, and the amount of soil spoils generated was limited. Instead, visual dust monitoring was performed, and no visible dust migration was observed in the fourth quarter of 2019.

### **Soil Management**

The EP screened material removed during excavations with a MultiRAE photoionization detector (PID). No elevated PID readings, odors, or staining were detected in any of the soils inspected in the fourth quarter of 2019. Therefore, no material segregation, material stockpiling, or offsite removal of soils were required in the fourth quarter of 2019. In the fourth quarter of 2019, the screened soils were replaced inside the excavated utility trenches. Excess screened soil was spread across the site for grading. Documentation for all clean fill placed during the fourth quarter of 2019 will be provided in the Sub-Parcel A8-1 Development Completion Report.

### **Water Management**

During the fourth quarter of 2019, water from dewatering was discharged into the infiltration gallery installed for the Northern Sewer development work, as approved by the MDE on April 8, 2019.

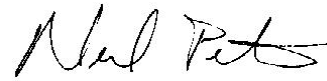


If you have questions regarding any information covered in this document, please feel free to contact ARM Group LLC at (410) 290-7775.

Respectfully Submitted,  
ARM Group LLC



Melissa A. Replogle, E.I.T.  
Project Engineer



T. Neil Peters, P.E.  
Senior Vice President



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**CRRGP F KZ'I**

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# Memo

To: Mr. Peter Haid – Tradepoint Atlantic  
From: Mr. Keith Progin  
cc:  
Date: March 28, 2019  
Re: Sub-Parcel A8-1 - Pre-Construction Meeting

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On March 28, 2019, a pre-construction meeting for Sub-Parcel A8-1 was held at the Tradepoint office at 1600 Sparrows Point Boulevard. In attendance were:

- Mr. Matthew Newman – Environmental Manager with Tradepoint Atlantic
- Mr. Oler Holden – Project Manager with Arco/Murray
- Mr. Mike Falky – Safety Manager with Arco/Murray
- Mr. Mike Zee – Senior Construction Manager with Gotham Greens
- Mr. Keith Progin – Senior Environmental Project Manager with Hillis-Carnes

During this meeting, the Environmental Professional roles that will be performed by Hillis-Carnes during the applicable portions of the development project were discussed. The roles generally include: a) monitoring of excavated soil; b) air monitoring for particulate dust; c) monitoring of dewatering activity; and d) documentation. A summary of these roles was provided to the attendees.

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## **APPENDIX H**

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## Keith Progin

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**From:** Barbara Brown -MDE- <barbara.brown1@maryland.gov>  
**Sent:** Wednesday, October 30, 2019 8:40 AM  
**To:** Keith Progin  
**Cc:** Jennifer Sohns -MDE- (jennifer.sohns@maryland.gov)  
**Subject:** Re: TPA\_Gotham Greens\_CR-6 Clean Fill Request

Hello Keith

The material from Martin Marietta as described in the certification letter is acceptable for use as clean fill at the Gotham Greens site and the rest of Sparrows Point.

On Wed, Oct 30, 2019 at 8:23 AM Keith Progin <[kprogin@hcea.com](mailto:kprogin@hcea.com)> wrote:

Please see the revised letter from Martin Marietta attached.

Thanks!

Keith Progin | Senior Environmental Project Manager  
**HILLIS-CARNES ENGINEERING ASSOCIATES**

Cell (443) 250-9467  
Phone +1 (410) 880-4788 X1145  
Fax +1 (410) 880-4098

**From:** Barbara Brown -MDE- <[barbara.brown1@maryland.gov](mailto:barbara.brown1@maryland.gov)>  
**Sent:** Tuesday, October 29, 2019 9:53 AM  
**To:** Keith Progin <[kprogin@hcea.com](mailto:kprogin@hcea.com)>  
**Cc:** Jennifer Sohns -MDE- ([jennifer.sohns@maryland.gov](mailto:jennifer.sohns@maryland.gov)) <[jennifer.sohns@maryland.gov](mailto:jennifer.sohns@maryland.gov)>  
**Subject:** Re: TPA\_Gotham Greens\_CR-6 Clean Fill Request

Hi Keith

Getting closer-letter needs to say its virgin material quarried there and not recycled...

On Tue, Oct 29, 2019 at 9:47 AM Keith Progin <[kprogin@hcea.com](mailto:kprogin@hcea.com)> wrote:

Barbara,

Please see the attached clean fill request for CR-6 from Martin Marietta to be used beneath the asphalt accessway at Gotham Greens.

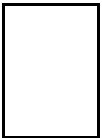
Thanks!

Keith Progin | Senior Environmental Project Manager

**HILLIS-CARNES ENGINEERING ASSOCIATES**

Corporate Headquarters  
10975 Guilford Road, Suite A  
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Cell (443) 250-9467  
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Email [kprogin@hcea.com](mailto:kprogin@hcea.com)

Website [www.hcea.com](http://www.hcea.com)



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2018 ENR Top 500 Design Firm #335



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**Barbara Brown**

**MDE-LRP-VCP Section Head**

**direct 410 537 3212**

**general 410 537 3493**



## Keith Progin

---

**From:** Jennifer Sohns -MDE- <jennifer.sohns@maryland.gov>  
**Sent:** Wednesday, November 6, 2019 11:25 AM  
**To:** Keith Progin  
**Cc:** Barbara Brown -MDE- (barbara.brown1@maryland.gov)  
**Subject:** Re: TPA\_Clean Fill Approval\_#10 Screenings

Keith,  
This material may be used as clean fill on Parcel A8-1 (Gotham Greens).  
Thank you,

Jennifer Sohns, Project Manager  
Land and Materials Administration  
Maryland Department of Environment - VCP  
410-537-4472

On Mon, Nov 4, 2019 at 10:13 AM Keith Progin <[kprogin@hcea.com](mailto:kprogin@hcea.com)> wrote:

Please see the attached clean fill request for #10 screenings to be used a Gotham Greens.

Thanks!

Keith Progin | Senior Environmental Project Manager

### HILLIS-CARNES ENGINEERING ASSOCIATES

Corporate Headquarters  
10975 Guilford Road, Suite A  
Annapolis Junction, MD 20701  
Cell (443) 250-9467  
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Email [kprogin@hcea.com](mailto:kprogin@hcea.com)

Website [www.hcea.com](http://www.hcea.com)



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## Keith Progin

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**From:** Keith Progin  
**Sent:** Tuesday, November 26, 2019 10:40 AM  
**To:** Barbara Brown -MDE-  
**Cc:** Jennifer Sohns -MDE- (jennifer.sohns@maryland.gov)  
**Subject:** RE: TPA\_A8-1\_Topsoil Approval  
**Attachments:** Topsoil Letter - Baltimore Zoo.pdf

Barbara,

Please see the attached letter from Bry's Landscaping certifying that Bry's Landscaping excavated the topsoil from the Baltimore Zoo.

Please let me know if you need anything else.

Thanks!

Keith Progin | Senior Environmental Project Manager  
**HILLIS-CARNES ENGINEERING ASSOCIATES**

Cell (443) 250-9467  
Phone +1 (410) 880-4788  
Fax +1 (410) 880-4098

**From:** Barbara Brown -MDE- <barbara.brown1@maryland.gov>  
**Sent:** Monday, November 25, 2019 3:20 PM  
**To:** Keith Progin <kprogin@hcea.com>  
**Cc:** Jennifer Sohns -MDE- (jennifer.sohns@maryland.gov) <jennifer.sohns@maryland.gov>  
**Subject:** Re: TPA\_A8-1\_Topsoil Approval

Hi Keith

The sample results look ok for industrial use..but will need some certification that the material actually came from the baltimore zoo location...

On Mon, Nov 25, 2019 at 11:21 AM Keith Progin <[kprogin@hcea.com](mailto:kprogin@hcea.com)> wrote:

Barbara,

Bry's Landscaping is proposing transporting approximately 450 yards of topsoil to A8-1 (Gotham Greens). The topsoil was reportedly excavated during the installation of a bio-retention area at the Baltimore Zoo. The material was then stockpiled at Owl Metals at 1936 Rettman Lane in Dundalk. Jenkins Environmental collected a 10 point composite sample from the stockpile on October 11, 2019. Please see the attached documents for approval.

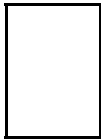
Thanks!

Keith Progin | Senior Environmental Project Manager

**HILLIS-CARNES ENGINEERING ASSOCIATES**

Corporate Headquarters  
10975 Guilford Road, Suite A  
Annapolis Junction, MD 20701  
Cell (443) 250-9467  
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Email [kprogin@hcea.com](mailto:kprogin@hcea.com)

Website [www.hcea.com](http://www.hcea.com)



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2018 ENR Top 500 Design Firm #335



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**Barbara Brown**  
**MDE-LRP-VCP Section Head**  
**direct 410 537 3212**  
**general 410 537 3493**

[Click here](#) to complete a three question customer experience survey.

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## APPENDIX I

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# Modified Level D Contractor Certification

## Ground Intrusive Work

In accordance with the *Response and Development Work Plan (RDWP) for Area A: Sub-Parcel A8-1*, dated February 15, 2018, Section 3.3.2, *Sub-Parcel A8-1 SLRA Results and Risk Characterization*, a site-specific ground intrusive work exposure duration of 45 days was established. In lieu of tracking exposure days for each employee, the RDWP allows for the employment of Modified Level D personal protective equipment (PPE) or equivalent elevated PPE as required by Site conditions. Modified Level D is defined below. For this project the contractor adopted Modified Level D PPE upon commencement of work (Day 1).

### Project Statement:

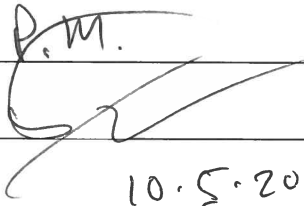
**Prior to the start of the project ARCO adopted Modified Level D as the baseline PPE for all personnel involved in ground intrusive work. Modified Level D was used from Day 1 of the project by all personnel involved in ground intrusive work.**

### Statement Certification:

Company: DXI Construction

Name: D.J. Co. O

Title: P.M.

Signature: 

Date: 10.5.20

### Modified Level D PPE

Modified Level D PPE will include, at a minimum, overalls such as polyethylene-coated Tyvek or clean washable cloth overalls, latex (or similar) disposable gloves (when working in wet/chemical surroundings) or work gloves, steel-toe/steel-shank high ankle work boots with taped chemical-protective over-boots (as necessary), dust mask, hard hat, safety glasses with side shields, and hearing protection (as necessary). If chemical-protective over-boots create increased slip/trip/fall hazardous, then standard leather or rubber work boots could be used, but visible soils from the sides and bottoms of the boots must be removed upon exiting the Exclusion Zone.

# Modified Level D Contractor Certification

## Ground Intrusive Work

In accordance with the *Response and Development Work Plan (RDWP) for Area A: Sub-Parcel A8-1*, dated February 15, 2018, Section 3.3.2, *Sub-Parcel A8-1 SLRA Results and Risk Characterization*, a site-specific ground intrusive work exposure duration of 45 days was established. In lieu of tracking exposure days for each employee, the RDWP allows for the employment of Modified Level D personal protective equipment (PPE) or equivalent elevated PPE as required by Site conditions. Modified Level D is defined below. For this project the contractor adopted Modified Level D PPE upon commencement of work (Day 1).

### Project Statement:

**Prior to the start of the project ARCO adopted Modified Level D as the baseline PPE for all personnel involved in ground intrusive work. Modified Level D was used from Day 1 of the project by all personnel involved in ground intrusive work.**

### Statement Certification:

Company: SEH Excavating, Inc.

Name: Chris Tackett

Title: Senior Project Manager

Signature: *Christopher Tackett*

Date: 9.25.20

### Modified Level D PPE

Modified Level D PPE will include, at a minimum, overalls such as polyethylene-coated Tyvek or clean washable cloth overalls, latex (or similar) disposable gloves (when working in wet/chemical surroundings) or work gloves, steel-toe/steel-shank high ankle work boots with taped chemical-protective over-boots (as necessary), dust mask, hard hat, safety glasses with side shields, and hearing protection (as necessary). If chemical-protective over-boots create increased slip/trip/fall hazardous, then standard leather or rubber work boots could be used, but visible soils from the sides and bottoms of the boots must be removed upon exiting the Exclusion Zone.